

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
v. ) ) Criminal No. 19-8  
NOAH LANDFRIED )  
MARIO ALLEN )  
LARRY BENAVIDES )  
DASHAWN BURLEY )  
MICHEL CERCONE )  
AHMAD FLETCHER )  
MICHAEL S. FRAWLEY )  
CHRISTOPHER GAHAGAN )  
RICHARD GEORGELOS )  
NICHOLAS GIAMMICHELE )  
ROBERT KORBE )  
PRIYANKA KUMAR )  
ROSS LANDFRIED )  
STERLING MARSHALL )  
DARREN MARTIN )  
HAROLD NOVICK )  
PAUL NUARA )  
OMARI PATTON )  
JAMES PERRY )  
JOHN RAMSEY )  
DONNELL STEWARD )  
QUOC BOA TRINH )  
ANGELO WILLIAMS )  
TERRELL WILLIAMS )  
RICHARD WOOD )  
SHAYLA YATES )  
KRYSTIAN ZARATE )

## **MOTION TO UNSEAL INDICTMENT AND ARREST WARRANTS**

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Craig W. Haller, Assistant United States Attorney for said District, and, pursuant to Rules 6(e)(4) and 6(e)(6) of the Federal Rules of Criminal Procedure, respectfully moves the Court to issue an Order

unsealing the Indictment returned in this case and the Arrest Warrants issued pursuant to said Indictment. In further support of this Motion, the United States avers as follows:

1. An Indictment was returned by the Grand Jury charging the above-named defendants with violating federal law. Arrest warrants were issued for the defendants pursuant to said Indictment.
2. After the return of the Indictment, the Court issued an Order sealing the aforesaid Indictment and Arrest Warrants, together with the Motion to Seal, until further Order of Court.
3. The defendants are in custody or are now otherwise aware of the Indictment and arrest warrants as a result of attempts to arrest them.
4. Based upon the foregoing, it is in the interest of justice that the Indictment returned in this case and the Arrest Warrants issued thereby now be unsealed.

WHEREFORE, the United States of America respectfully requests that this Court issue an Order unsealing the Indictment returned in this case and the Arrest Warrants issued pursuant to the Indictment.

Respectfully submitted,

SCOTT W. BRADY  
United States Attorney

By: s/ Craig W. Haller  
CRAIG W. HALLER  
Assistant U.S. Attorney  
PA ID No. 87714